

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JUDITH BOYD, as Special Administrator	)	
Of the Estate of LARRY BOYD, deceased,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 13-cv-00056-JPG-SCW
	)	
VIRGIL CALVERT NURSING &	)	
REHABILITATION CENTER, INC., VIRGIL	)	
CALVERT PROPERTY, LLC, CAHOKIA	)	
NURSING & REHABILITATION CENTER,	)	
INC., SW MANAGEMENT COMPANY,	)	
CAHOKIA BUILDING, LLC, SHELDON	)	
WOLFE, RONNIE KLEIN, MOSHE	)	
HERMAN, KATHLEEN CRAWFORD, SYED	)	
HUSSAIN, M.D., WANDA CONYERS, R.N.,	)	
VICKI COOPER, R.N., CHRISTINE HOOKS,	)	
R.N., LAURA SEGELHORST, R.N., DIANE	)	
FOSSETT, R.N., ROSEMARY GREEN, R.N.,	)	
MARCY CRANDALL, L.P.N., CHINELLE	)	
FERREL, L.P.N., MARY GRANGER, L.P.N.,	)	
RODERICKA HICKMAN, L.P.N.,	)	
KEYWANA JOHNSON-LEE, L.P.N.,	)	
ANGELA SHARP, L.P.N., PATRICIA	)	
WESLEY, L.P.N., TERESA ROBERG,	)	
O. BASGA BERNARD, M.D., LINDA	)	
STUCKEY, R.N., CHERYL SCHAEFER, R.N.,	)	
CRYSTAL ATWOOD, L.P.N., PENNY	)	
BRIONES, L.P.N., GLENDA GILBERT,	)	
L.P.N., EILEEN HISEL, and SHAILAJA	)	
PULISSETTY, M.D.,	)	
	)	
Defendants.	)	

NOTICE OF REMOVAL

The United States of America and defendant Shailaja Pulisetty, M.D., by their attorneys, Stephen R. Wigginton, United States Attorney for the Southern District of Illinois, and Laura J. Jones, Assistant United States Attorney, make this notice of removal pursuant to 42 U.S.C § 233 and state as follows:

1. The defendant, Dr. Shailaja Pulisetty, is a defendant in a civil action now pending in the Circuit Court for the Twentieth Judicial Circuit, St. Clair County, Illinois, as case entitled: *Judith Boyd, as Special Administrator of the Estate of Larry Boyd, deceased, vs. Virgil Calvert Nursing & Rehabilitation Center, Inc., et al.*; case number 11-L-176. A copy of the First Amended Complaint, originally filed in the Circuit Court of Cook County, Illinois, is attached as Exhibit A. The case was transferred to the Circuit Court for the Twentieth Judicial District. A copy of the order transferring the case is attached as Exhibit B. No trial has been held in that action.

2. In the First Amended Complaint, plaintiff alleges that Dr. Pulisetty committed medical negligence.

3. This action is removable pursuant to 42 U.S.C. § 233. Dr. Pulisetty was at all relevant times acting within the scope of her deemed employment for the United States of America. Pursuant to 42 U.S.C. § 233, the Attorney General, through the United States Attorney, has certified that Dr. Pulisetty was acting within the scope of her deemed office or employment at the time the claim arose. *See* Exhibit C.

4. Upon certification, any civil proceeding in a state court shall be removed to the United States District Court, and such action shall be deemed to be against the United States as a substituted party. 42 U.S.C. § 233(c). Therefore, upon the certification, the case is removable.

WHEREFORE, the United States of America and defendant Dr. Shailaja Pulisetty remove this action to the United States District Court for the Southern District of Illinois pursuant to 42 U.S.C. § 233.

DR. SHAILAJA PULISETTY  
UNITED STATES OF AMERICA

STEPHEN R. WIGGINTON  
United States Attorney

*/s/ Laura J. Jones*  
LAURA J. JONES  
Assistant United States Attorney  
United States Attorney's Office  
Nine Executive Drive  
Fairview Heights, Illinois 62208-1344  
Phone: (618) 628-3700  
Fax: (618) 622-3810  
E-mail: [Laura.Jones@usdoj.gov](mailto:Laura.Jones@usdoj.gov)